

KEN McCARTNEY, Bar No. 5-1335
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING

In re:)	
DENNIS MEYER DANZIK,)	
)	Case No. 17-20934
)	CHAPTER 11
Debtor.)	

DEBTOR'S RESPONSE TO THE MOTION TO BAR
THE DEBTOR FROM FILING FOR 180 DAYS

COMES NOW the Debtor above named, by Ken McCartney of The Law Offices of Ken McCartney, P.C. and in response to the Motion to Bar the Debtor from filing within 180 days offers the following:

1. This motion is not even a thinly disguised effort to keep someone with section 547 powers from interfering with the execution the movant made on the Debtor in Possession's bank account moments after this court's dismissal order.
2. The problem is that the request is styled under 11 U.S.C. §109(a) wherein congress gave the court authority to impose the requested bar, but did so for two very specific reasons and only these two.
3. The Debtor did not disobey any court orders.
4. The Debtor did not request a voluntary dismissal after a stay relief application.
5. While alleging other cause might exist provides yet another opportunity be

belign Mr. Danzik's character.

6. but those often repeated assertions fall short of demonstrating a Debtor who put \$500,000 in the bank with which to pay creditors while paying all current income and payroll taxes on the deposited funds, acted in bad faith while in chapter 11. Bad faith? Debtor's counsel does not think so.
7. Movant's counsel's assertion that the Debtor's efforts demonstrate bad faith and defiance to fit the language of some thinly applicable 10 Circuit cases stretches imagination to the limit. Where is there defiance in putting a half million dollars on the table with which he fully intended to pay creditors?

WHEREFORE, Applicant prays for the entry of an order converting this case to Chapter 7, if not no order limiting the estate's access to section 547 powers.

DONE this 28th day of February, 2019.

Respectfully submitted for the Debtor

By: /s/ Ken McCartney
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CERTIFICATE OF SERVICE

The undersigned certifies that the forgoing was directly served on all E filers this 28th day of February, 2019.

/s/ Ken McCartney